

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the
Southern District of Texas

United States of America

v.

Jorge LOPEZ-Guerrea
Juliana REYNERO

Case No.

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 21, 2021 in the county of Webb in the
Southern District of Texas, the defendant(s) violated:*Code Section*

8 USC 1324

Offense Description

Knowing and in reckless disregard of the fact that an alien had come to, entered, and remained in the United States in violation of law, did transport and move and attempted to transport and move and conspired to transport and move such alien within the United States by means of transportation and otherwise in furtherance of such violation of law.

This criminal complaint is based on these facts:

Continued on Affidavit

☒ Continued on the attached sheet.

/S/Brandy M. Ochoa-Hauser

Complainant's signature

Brandy M. Ochoa-Hauser, Border Patrol Agent

Printed name and title

Sworn to before me and signed in my presence,

Date: October 25, 2021*Judge's signature*City and state: Laredo, Texas

Diana Song Quiroga, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

In support of Criminal Complaint

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

V.

Jorge LOPEZ-Guerrea, Juliana REYNERO

Case Number:

1. On October 21, 2021, at approximately 3:15 p.m., a Border Patrol Agent (BPA) working the Laredo North Checkpoint located at the 29 mile marker of IH-35 near Laredo, Texas in Webb County, encountered a tan four door Nissan Rogue with three adults and two children. At the time, BPA acknowledged the driver, later identified as Juliana Reynero, who then provided the BPA with legal documents for herself and her children. The BPA then noticed a subject in the back, later identified as Rocio Silva-Marquez, The BPA asked if she was a United States Citizen (USC), and she did not reply. The BPA then repeated the question in the Spanish language and the subject still refused to respond. The BPA then asked the front passenger, later identified as Jorge Lopez-Guerrea, if he was a USC and he did not reply. The BPA then repeated the question in the Spanish language and Lopez-Guerrea provided a Texas Identification license. The BPA then refer red the vehicle to secondary for further Inspection.

2. At secondary, it was determined that Juliana Reynero was a USC and that Jorge Lopez-Guerrea was a Legal Permanent Resident. It was also established that Rocio Silva-Marquez was illegally present in the United States. All subjects were placed und er arrest and escorted into the checkpoint for further investigation.

3. **PRINCIPAL STATEMENT:** Juliana Reynero, a United States Citizen, was provided her Miranda Rights and acknowledged she understood them by signing service for I-214. The interview was terminated due to medication the subject had consumed.

4. **PRINCIPAL STATEMENT:** Jorge Lopez-Guerrea, a Legal Permanent Resident, was provided his Miranda Rights and acknowledged he understood them by signing service for I-214 and was willing to provide a statement without a lawyer present. Lopez-Guerrea stated that he was accompanying his wife, Reynero, to San Antonio to drop off her friend, Silvia-Marquez. Lopez-Guerrea stated that he had never met Silva-Marquez before until two days ago. Lopez-Guerrea stated that Silvia-Marquez stayed at their home. Lopez-Guerrea stated that he had no prior knowledge that Silvia-Marquez was illegally present in the United States.

5. **MATERIAL WITNESS STATEMENT:** Rocio Silva-Marquez, is a Mexican national who admitted being in the United Stated illegally and is serving as a material witness in the alien smuggling case against Juliana Reynero and Jorge Lopez-Guerrea. Silva-Marquez stated that her cousin made the arrangements for her to be smuggled into the United States for approximately \$10,000 United States Dollars (USD), half was paid when she crossed and the remaining when she arrived at her destination in California. On October 19, 2021, Silva-Marquez illegally crossed the Rio Grande River from Mexico to the United States near Laredo, Texas. Upon arrival to the United States, she walked for approximately one hour until an unknown man picked her up. Silva-Marquez stated that the unknown man drove them to two homes and stayed at the second house. Silva-Marquez stated that she stayed at that home for approximately two hours. The unknown man then escorted Silva-Marquez to a Family Dollar Store where she was instructed to get in the vehicle which contained Juliana Reynero and Jorge Lopez-Guerrea. Reynero and Lopez-Guerrea then took Silva-Marquez to their residence where she stayed for 2 days. On October 21, 2021, Silva-Marquez stated that Reynero and Lopez-Guerrea instructed her on how to talk to BPA at the Checkpoint along with providing sunglasses and new clothes. Silva-Marquez stated that Reynero and Lopez-Guerrea attempted to make her swallow a white pill multiple times, later found to be Xanax.

SUBSCRIBED and SWORN to before me on

25th

day of

October, 2021

Signature of Judicial Officer

/S/ Ochoa-Hauser, Brandy M. Border Patrol Agent
Signature of Complainant